

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

ELMAINA WALKOFF and
MILKA VALDES,

Plaintiffs,

v.

Case No.: 0:24-cv-61297-MD

Z.M. MANAGEMENT GROUP LLC
d/b/a ZESTY MAIDS, a Florida Limited
Liability Company, and SPRUCE SERVICES, INC.
d/b/a SPRUCE, a Foreign Corporation,

Defendants.

DEFENDANT Z.M. MANAGEMENT GROUP LLC
d/b/a ZESTY MAIDS'S UNOPPOSED MOTION FOR
EXTENSION OF TIME TO RESPOND TO PLAINTIFFS' AMENDED
COMPLAINT AND INCORPORATED MEMORANDUM OF LAW

Defendant Z.M. Management Group LLC d/b/a Zesty Maids ("Zesty")¹, through undersigned counsel, respectfully asks this Court for an extension of time to respond to the Amended Complaint through and including September 13, 2024, for the reasons that follow.

1. On July 22, 2024, Plaintiffs filed their Complaint. (Doc. 1). Zesty was served on July 30, 2024. Plaintiffs then filed their Amended Complaint on August 9, 2024. Accordingly, Zesty's deadline to respond to the Amended Complaint is August 23, 2024.

2. Zesty only recently retained the undersigned counsel in this matter. Zesty and undersigned counsel are in the process of reviewing the issues raised in the Amended Complaint and gathering information relevant to the response and defense of this matter.

¹ Defendant Zesty acknowledges this Court's Order on Multiple Defendants (Doc 4) entered herein. Defendant Zesty files this Motion individually, as Defendant Spruce Services, Inc. has not made an appearance as of the date of this filing.

3. Due to Zesty having only recently retaining counsel, and due to counsel's already busy schedule filled with many other ongoing litigation matters, Zesty respectfully requests additional time to file their response to the Amended Complaint to allow the undersigned to review the underlying client documents, claims asserted, and provide an assessment and recommendation to Zesty regarding next steps in the case.

4. The Court may grant an enlargement of time for good cause shown when the request is made before the original time expires. Fed. R. Civ. P. 6(b). Zesty requests for an extension is made in good faith and does not prejudice Plaintiffs. In fact, Plaintiffs agree to the proposed extension. Permitting the extension will enable Zesty to develop a response to the allegations in the Amended Complaint following analysis of the relevant files and possibly discuss early resolution of the case.

For these reasons and the good cause shown, Zesty respectfully requests that the Court grant this Motion and extend the deadline to respond to the Amended Complaint through and including September 13, 2024.

Local Rule 7.1(a)(3) Certification

On August 20, 2024, Zesty's counsel exchanged communications with Plaintiffs' counsel regarding the relief requested in this Motion. Zesty is authorized to represent that Plaintiffs have no objection to the relief requested in this Motion.

Dated this 21st day of August, 2024.

Respectfully submitted,

Spire Law, PLLC
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By: /s/ Jesse Unruh
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*Attorneys for Z.M. Management Group LLC
d/b/a Zesty Maids*

Certificate of Service

I hereby certify that on this 21st day of August, 2024, the foregoing was electronically filed through the CM/ECF system, which will send a notice to

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Additionally, a true and correct copy was sent via U.S. Mail to:

SPRUCE SERVICES, INC
c/o C T Corporation System, Registered Agent
1200 South Pine Island Road
Plantation, FL 33324

/s/ Jesse Unruh
Attorney